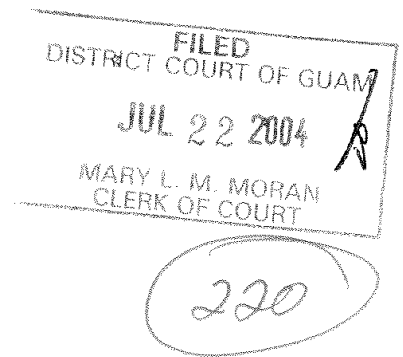


JOAQUIN C. ARRIOLA
ANITA P. ARRIOLA
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street, Suite 201
Hagåtña, Guam 96910
Tel: (671) 477-9730
Fax: (671) 477-9734



Attorneys for Plaintiffs Alan Sadhwani, et al.

**IN THE UNITED STATES
DISTRICT COURT OF GUAM**

ALAN SADHWANI, LAJU SADHWANI,)
and K. SADHWANI'S INC., a Guam)
corporation,)

Plaintiffs,)

vs.)

HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD., a)
Foreign corporation,)
JOHN DOE I through JOHN DOE X,)

Defendants.)

CIVIL CASE NO. 03-00036

**DECLARATION OF ALAN
SADHWANI IN SUPPORT OF EX
PARTE MOTION FOR
PROTECTIVE ORDER RE
SCHEDULING OF DEPOSITION
OF LAJU SADHWANI**

ALAN SADHWANI, being duly sworn, deposes and says:

1. I am one of the plaintiffs in the above-entitled case. I make this Affidavit in support of Plaintiffs' Motion for Protective Order Re Scheduling of Deposition of Laju Sadhwani. I have personal knowledge of the facts contained herein.

2. Over a year ago, my family was invited to attend a wedding and reception in Jakarta on Sunday and Monday, July 25 and 26, 2004. The groom's family is a very close friend of ours. Mrs. Sadhwani treated the grandmother of the groom as her mother. My wife and the groom's family lived in different apartments but in the same building. Although we are not blood relations,

ORIGINAL

we treat our friends as family. In fact, my children from California also will be attending the wedding. I had originally planned to attend. Unfortunately, because of the various depositions scheduled by Hong Kong Bank, I changed plans and decided to stay.

3. My wife and my children were scheduled to leave Guam for Jakarta for some time in anticipation of this family event, the tickets were arranged in advance, and my wife departed on Tuesday.

4. My wife is scheduled to leave Jakarta the evening of Tuesday, July 27, 2004 via Bali, where she will depart the same evening, arriving on Guam, Wednesday, July 28.

I declare under penalty of perjury under the laws of Guam and the United States that the foregoing is true and correct.

Dated this 22nd day of July, 2004.


ALAN SADHWANI